

**Cursory Comparison of Mercury Strategies**  
**By Tom Mugan 7/20/00**

	Michigan – 2/8/00	Minnesota – 2/28/00	Ohio – 12/14/99	Maine – 1/20/00 (Expires 10/1/01)
Numerical limits	For 00 and 01 reissued permits - Limit of 200 ng/L (daily max.) for first two years, then variance limit of 30 ng/L (annual ave.) or higher if it can be justified with 1631 data	First reissuance – Limits only for few facilities with low-level data. Use normal variance procedure if needed. Next reissuance – data collected during first permit term used for RP determination and limits	Variance limit of 30 ng/L (ave.). No greater than 12 ng/L (lower if achievable) by the end of the 5-year permit term. Some permittees may be able to achieve WQ limits without variance	Variance to existing effluent quality but no lower than 4.5 (ave.) and 1.5 x ave. (max)
Establishing reasonable potential	Issue limits if permit has existing limits or reasonable potential (not defined). If insufficient data, reissue permit with PMP trigger based on 2 yrs of monitoring data.	Normal GLI RP procedure	Normal GLI procedures using available data. Must have 1631 data to get variance.	All POTWs and industrial process waste permits get interim effluent limits
What permittees does this apply to?	All?	See monitoring freq.	Normal GLI RP procedure	All POTWs and industrial process waste permits get interim effluent limits
Sampling (grab/comp.)	Grab for method 1631	Training important	Grab for method 1631	Grab
Monitoring freq.	About 2 x monthly (if limit in permit)	Monitoring only (no limits) Majors – ¼'yly Minors – twice annually Ponds – once each discharge Stormwater – case-by-case	About 1 x monthly	3 or 4 tests required to establish interim limit 2 or 4 tests/yr for compliance
Use of method 1631	Allows 1 year before 1631 is required	Required of all except those exempted	Necessary to apply for variance and to demonstrate compliance with variance limit (unless limit is high enough that “regular” method is sensitive enough.	Necessary to establish interim limit and to demonstrate compliance with interim limit
PMPs	Required as condition of variance	Voluntary Mercury Contamination Reduction Initiative (MCRI) will be marketed aggressively	Plan of study to meet 12 ng/L and PMP as condition of variance	Required of all
General notes	For future years (starting in 2002), Michigan is considering requiring 1631 testing with applications	Effluent limits will be considered interim until allocation stage of TMDL		